



Lutheran Social Services  
of Wisconsin and Upper Michigan, Inc.

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November 3, 2003

NOV 24 2003

US Department of State  
\*CA/OCS/PRI  
Adoption Regulations Docket  
Room SA-29  
2201 C Street, NW  
Washington, DC 20520

RE: Docket: State/AR-01/96

To Whom It May Concern:

On behalf of Lutheran Social Services of Wisconsin and Upper Michigan, Inc.(LSS), I am submitting comments concerning the implementation of the Hague Treaty. On the attached page are several points that LSS would like to have considered prior to the final draft of The Hague being released.

If you wish to speak with me regarding the attached comments, I may be contact by phone at 414-325-3150 or via e-mail at [www.lschaefer@lsswis.org](mailto:www.lschaefer@lsswis.org).

Thank you for your consideration.

Sincerely,

Liz Schaefer, MSW

Director of Adoption Services

Lutheran Social Services of Wisconsin & Upper Michigan, Inc.

Hague Comments

- (1) 96.37 (f) (g) This reg. requires a Master's level person to provide home study services to adoptive families. This requirement would significantly impact all adoption agencies because and increase costs to adoptive families. We acknowledge the importance of a Master's level person in supervision of the home study preparation but recommend that a person with a Bachelor's level in a human services related field, or a Certified Social Worker under the supervision of a Master's level person be able to provide the home study for adoptive families.
- (2) 96.39 (d) This regulation prohibits the use of a "blanket waiver" with adoptive families. We request that this term have more definition. We would also suggest that it is necessary that organizations have the ability to have waivers approved by a body in order to limit frivolous lawsuits that can be brought against adoption agencies.
- (3) 96.40 This regulation precludes us from providing information to adoptive parents which would include all adoption related costs, since some adoption related costs are not controlled by the adoption agency. (Example: international travel or flights, visas, costs for processing with BCIS, hotel or living expenses in the foreign country, and other ancillary charges will no longer be given to adoptive families because of the limitations placed through this regulation.) Only agency fees that are within the control of the organization will be included in the costs given to adoptive families.

Additionally we are concerned that (3) does suggest in individualization of case costs vs. cost averaging. This would defeat the ability for an adoption agency to predict costs.

NOV 26 2003

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November 10, 2003

RE: Docket; State/AR-01/96

To Whom It May Concern:

Lutheran Social Services of Wisconsin and Upper Michigan, Inc. recommends "recognition of compliance" with identified duplicative standards for those agencies currently accredited by COA for intercountry adoption services.

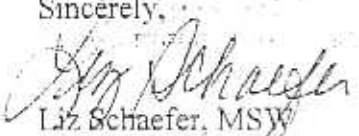
Lutheran Social Services of Wisconsin and Upper Michigan, Inc. understands the importance of the new Hague Accreditation standards and process to ensure compliance with the Intercountry Adoption Act. Currently, Lutheran Social Services of Wisconsin and Upper Michigan, Inc., is accredited by the Council on Accreditation for Intercountry Adoption Services. Having already demonstrated compliance with a number of sufficiently similar standards, we encourage the State Department to allow currently COA accredited organizations to receive credit for compliance this select group of duplicative standards.

"Recognition" provides no unfair benefit to currently accredited agencies, as we will not achieve full accreditation without undergoing the Hague Accreditation and responding to a significant number of additional standards. In sum, all intercountry adoption providers will be held to the exact same requirements regardless of their current voluntary accreditation status, however the documentation and review of duplicative standards (see the attached crosswalk) would be unnecessary.

Attached is the chart prepared by COA identifying the sufficiently similar standards that warrant recognition. A copy of the complete crosswalk comparison of the regulations and COA standards was provided in COA's comments to the draft regulations, or could be obtained by contacting COA.

Your consideration of this "recognition" is greatly appreciated. It is apparent that all organizations, government oversight bodies and accreditors are pursuing quality standards and in these times of important movement towards accountability it is also important to achieve these outcomes without duplication of effort.

Sincerely,

  
Liz Schaefer, MSW  
Director of Adoption Services

Motivated by the compassion of Christ,  
we help people improve the quality of their lives.

**Proposed Standards for Recognition  
for Hague Accreditation**

Sufficiently Similar	
Proposed Rules	COA Standards
96.30 a)	S15.2
96.30 b)	G11.3.01
96.30 c)	S15.2.03
96.32 b)	G3.1.01, G3.6, and G3.7.01 (a, d)
96.32 c)	G3.5.07
96.33 a)	G6.2.02 and G6.2.04
96.34 c)	S15.3.03
96.34 d)	G4.2.02
96.35 d) 1)	G4.7.04
96.37 a)	S15.6
96.37 b)	S15.6.04
96.37 c)	S15.6.07
96.37 d) 1)	S15.6.01 (a)
96.37 d) 2)	S15.6.01 (b)
96.37 e) 2)	S15.6.02
96.38 a) 6)	S15.6.03 (a)
96.38 a) 7)	S15.6.05 (b)
96.38 b) 1)	S15.6.03 (a)
96.38 b) 2)	S15.6.03 (b, d)
96.38 b) 7)	S15.6.03 (b)
96.39 c)	S15.3.06
96.40 a)	S15.3.01
96.40 b) 3)	S15.3.02 (e)
96.40 b) 7)	S15.3.01
96.41 d)	G1.8 (d)
96.41 h)	G2 and G2.1.01
96.42 d)	S15.5.01 (a, c)
96.42 e)	G11.4.07 (a)
96.45 a) 1)	G11.8.05 (a)
96.45 b) 5)	G11.7.04 (i)
96.45 b) 13)	G11.7.04 (l)
96.47 a) 2)	S15.4.02 (c)
96.47 c) 2)	S15.2.03
96.48 b) 7)	S15.4.07
96.48 c) 1)	S15.4.07
96.48 c) 3)	S15.4.03 (c)
96.50 c)	S15.5.02 (b)
96.50 g)	S15.5.02 (a)

This chart was developed by the Council on Accreditation. Any questions should be directed to: Jayne Pietrass, Council on Accreditation; [jpietrass@coanet.org](mailto:jpietrass@coanet.org) or 866-COA-8088.